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To

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PM

Subject  
Question regarding applicability  
of SPCC Rule to Mercaptan Odorant  
for Natural Gas Distribution  
Facilities

Greetings: I have a question regarding the applicability of SPCC regulations to the use of Mercaptans (the odorant added to natural gas to make it smell) in natural gas distribution.

Natural gas has odorant added to make it smell. Odorants are lighter than oil (specific gravity of 0.8) and are comprised of Tert-Butyl-Mercaptan or other mercaptans. It is highly flammable and decomposes as oxides of sulfur and/or hydrogen sulfides. It has negligible water solubility.

My question is as follows, assuming a distribution company were to have the capacity to store 2,000 gallons of liquid odorant at a pipeline injection station, that is, built above ground, under 50 psi of pressure or more, atop a natural gas pipeline, would the SPCC requirements apply.

I ask this because some of my peers believe that they would be exempt from SPCC requirements since this is a DOT facility (pursuant to a memo of understanding issued years ago). Others believe that Mercaptans do not meet the legal definition of oil. And others believe that the sheen rule supersedes all regulations, making SPCC mandatory.

What is the EPA Position?

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